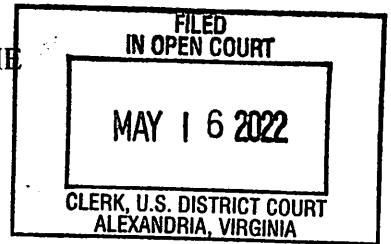


IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION



UNITED STATES OF AMERICA,)
)
 v.)
)
BABAK SAFAVI,)
 Defendant.)

Criminal No. 1:22cr 76

CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

On March 15, 2022, in Fairfax County, Virginia, within the Eastern District of Virginia, the defendant, BABAK SAFAVI, knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm and ammunition, that is, an Anderson MFG AM-15 rifle, serial number 20115191; an AR style rifle with no serial number; a Stag Arms Stag 15 rifle, serial number Y428465; a Smith and Wesson M&P 9 Pro, serial number HPH5239; 1135 rounds of .223 ammunition; 313 rounds of 9mm ammunition; 90 rounds of 5.56 x 45 ammunition; 500 rounds of .45 caliber ammunition; and 3 rounds of .22 ammunition, said firearms and ammunition having been shipped and transported in interstate and foreign commerce.

(In violation of Title 18, United States Code, Section 922(g)(1).)

FORFEITURE NOTICE

Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, defendant ~~JOSEPH~~ **BABAK** **SAFAVI** is hereby notified that, upon conviction of the single offense alleged in the Criminal Information, the defendant shall forfeit to the United States, pursuant to Title 18 United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition used in or involved in the violation.

The property subject to forfeiture includes, but is not limited to, the following:

1. an Anderson MFG AM-15 rifle, serial number 20115191;
2. an AR style rifle with no serial number;
3. a Stag Arms Stag 15 rifle, seral number Y428465;
4. a Smith and Wesson M&P 9 Pro, serial number HPH5239;
5. 1135 rounds of .223 ammunition;
6. 313 rounds of 9mm ammunition;
7. 90 rounds of 5.56 x 45 ammunition;
8. 500 rounds of .45 caliber ammunition; and
9. 3 rounds of .22 ammunition.
10. 3 silencers; and 11 magazines, firearm parts and tools, a drum magazine, 5 night vision and 4 scopes.

Pursuant to 21 U.S.C. § 853(p), defendant BABAK SAFAVI, shall forfeit substitute property, if, by any act or omission of BABAK SAFAVI, the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially

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diminished in value; or has been commingled with other property which cannot be divided without difficulty.

(In accordance with Title 18, United States Code, Section 924(d)(1); Title 28, United States Code, Section 2461(c); Title 21, United States Code, Section 853(p); and Rule 32.2(a) of the Federal Rules of Criminal Procedure)

Respectfully submitted,

Jessica D. Aber
United States Attorney

A handwritten signature in black ink, appearing to read "Ronald L. Walutes, Jr.", written over a horizontal line.

Ronald L. Walutes, Jr.
Assistant United States Attorney